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July 6, 2011

Lynn M. Fraser, Director
Office of Alternative Dispute Resolution
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Pre-MUR 519 Supplement

Dear Ms. Fraser:

This is to supplement National Right to Life PAC's TK sua sponte submission, which I understand has been designated as pre-MUR 519 and assigned to your office. I request that a related additional issue be addressed in a combined resolution of this matter.

Our earlier submission explained the circumstances of the omission of certain receipts from NRE PAC's initial 2010 July Quarterly report, the discovery of that error, and the investigation and substantial remedial action to address it. The committee's remediation included amending its 2010 July Quarterly report and all subsequent reports. In the course of these amendments, the committee made miscellaneous changes to address requests for additional information (RFAI's) and to otherwise improve disclosure.

Among the changes in these amendments was an increase in reported disbursements of \$112,068.33 on the committee's amended 2010 post-General report. To the extent that this amendment requires additional remediation, we would like to address it along with the July Quarterly error. The initial post-General report failed to include over \$100,000 in debt payments on Schedule D. The amended report includes the payments, creating an increase in disbursements as reported on the summary pages of the report.

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Discovery of the Violation and Investigation

This error was discovered in the same report review and reconciliation process described in our earlier submission. The cause was identified and remedied in the course of the investigation also previously described with the assistance of our software vendor and our FEC compliance consultant. The employee who prepared the initial post-General report was not then aware that debt payments for independent expenditures had to be entered as both debt payments and independent expenditures in order to appear on all required schedules and in summary totals.

The reporting requirements for Independent Expenditures (IE's) are notably complex, even for FECA reporting. Unlike ordinary expenditures, which are reported when payment is made, IE's must be reported when communications are disseminated. During September and October of 2010 NRL PAC issued a large number of IE's. The committee was compelled to report many of the associated costs as debt on its October Quarterly and pre-General reports simply because the committee had not been billed or had minimal time to process payments for services associated with the IE's. Because each IE requires separate itemization this resulted in scores of debt entries, even though debts were owed to only a few vendors. The combination of the IE and debt reporting rules required many IE's to be reflected in five entries each on two periodic reports and one 24 or 48 hour report. NRL PAC timely and accurately filed 24 or 48 hour reports for these expenditures, reported the expenditures on appropriate periodic reports, and reported debts associated with the expenditures. Our only error was the initial failure to report debt payments after expenditures had been made and reported.

The cause of this error was inadequate training of an employee newly responsible for FEC report preparation facing an extraordinarily complex reporting scenario.

Remedial Action

As outlined in our earlier submission, NREC and NRL PAC have significantly revised recordkeeping and reporting procedures to avoid reporting errors in the future. NRL PAC has adopted procedures consistent with the Commission's recommended internal controls, 72 FR 16695, retained a respected FEC compliance consultant, and taken other specific steps detailed in our previous submission.

Request

NRL PAC believes this matter also qualifies for fast track resolution in ADR because the committee is seeking to disclose and correct a straightforward reporting violation. NRL PAC believes its discovery, investigation, report, and remediation of this inadvertent violation warrant

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waiver or maximum reduction of any penalty pursuant to the commission's Sua Sponte Policy for substantially the same reasons detailed in our earlier submission.

If you have questions about this submission, please contact me.

Sincerely,

BOPP, COLESON & BOSTROM

A handwritten signature in black ink that reads "Barry A. Bostrom". The signature is written in a cursive style with a large, stylized initial "B".

Barry A. Bostrom

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